

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

WILLIAM FUELBERTH, Individually and
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

GODFATHER'S PIZZA, INC.,

Defendant.

Case No. 8:22-cv-00195

JOINT MOTION TO
STAY PROCEEDINGS

COME NOW the Plaintiffs William Fuelberth, Anthony Robert Cook, Ethan Bradley Brownell, William E. Donlan, Rebecca Holmes, Sara G. Hovorka, Christian Ramos, Jordan Schnider, Dylan Thomas, Halee Williams, Aaron Lyle Wilson, Noah Daniel Grice, Brad Mathewson, Dylan Araujo, Brian Avalos, Alex Leland Carey, Louis J. Hacker, Ryan Loye, Samuel J. Peterson, Edward Anthony Walbrecht, T'Challa Wayne Berg, Michael Anthony Miller, Tamara Schwid, James Dean Soderholm, Christopher Kollar, Gage Michael Kreeger-Collier, Amber Burbridge, Trenea Starks, Anthony Palazzola, Spencer Jonas, Christian Kjeldgaard, Melissa Spear, Joel Pattie, Guy Robert Brown II, Brandon L. Hopkins, Courtney James Schenk, Todd Taylor, Thomas Nastase, and Andrea Manganaro (collectively, the "Plaintiffs"), and Defendant Godfather's Pizza, Inc. ("Godfather's Pizza"), by and through their respective counsel, and jointly move this Court to stay the *Second Amended Final Progression Order* [46] and all deadlines in this case, to allow the parties to discuss potential resolution. In support thereof, the parties jointly state as follows:

1. The parties have exercised due diligence in the timely progression of this case, and they continue to discuss and work toward the production of certain information for purposes of evaluating whether the parties wish to engage in settlement discussions and/or mediation.

2. The parties have agreed to discuss potential resolution of this matter following completion of limited provisional discovery, including the production of additional information and documents.

3. In the interest of preserving judicial resources, the parties respectfully request this Court stay the *Second Amended Final Progression Order [46]* and all deadlines in this case, to allow the parties to complete this process and to discuss potential resolution, until the outcome of such potential resolution.

4. No party will be prejudiced by the requested stay. Rather, the requested relief will enable the parties to address their issues outside of the Court and to simultaneously preserve this Court's time and resources.

WHEREFORE, for the reasons set forth above, the parties respectfully and jointly move the Court to stay the *Second Amended Final Progression Order [46]* and all deadlines in this case.

Jointly submitted by:

WILLIAM FUELBERTH, ANTHONY ROBERT COOK,
ETHAN BRADLEY BROWNELL, WILLIAM E. DONLAN,
REBECCA HOLMES, SARA G. HOVORKA, CHRISTIAN
RAMOS, JORDAN SCHNIDER, DYLAN THOMAS,
HALEE WILLIAMS, AARON LYLE WILSON, NOAH
DANIEL GRICE, BRAD MATHEWSON, DYLAN
ARAUJO, BRIAN AVALOS, ALEX LELAND CAREY,
LOUIS J. HACKER, RYAN LOYE, SAMUEL J.
PETERSON, EDWARD ANTHONY WALBRECHT,
T'CHALLA WAYNE BERG, MICHAEL ANTHONY
MILLER, TAMARA SCHWID, JAMES DEAN
SODERHOLM, CHRISTOPHER KOLLAR, GAGE
MICHAEL KREEGER-COLLIER, AMBER
BURBRIDGE, TRENEA STARKS, ANTHONY
PALAZZOLA, SPENCER JONAS, CHRISTIAN
KJELDGAARD, MELISSA SPEAR, JOEL PATTIE, GUY
ROBERT BROWN II, BRANDON L. HOPKINS,
COURTNEY JAMES SCHENK, TODD TAYLOR,
THOMAS NASTASE, AND ANDREA MANGANARO,
Plaintiffs

By: /s/ Josh Sanford
Josh Sanford (Ark. Bar No. 2001037)
SANFORD LAW FIRM, PLLC
Kirkpatrick Plaza
10800 Financial Centre Pkwy, Suite 510
Little Rock, Arkansas 72211
Telephone: (800) 615-4946
Facsimile: (888) 787-2040
josh@sanfordlawfirm.com
Attorney for Plaintiffs

- and -

GODFATHER'S PIZZA, INC., Defendant

By: /s/ Tara A. Stingley
Tara A. Stingley (#23243)
Sydney M. Huss (#26581)
CLINE WILLIAMS WRIGHT
JOHNSON & OLDFATHER, L.L.P.
Sterling Ridge
12910 Pierce Street, Suite 200
Omaha, NE 68144
(402) 397-1700
tstingley@clnewilliams.com
shuss@clnewilliams.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

I, Tara A. Stingley, hereby certify that on this 6th day of June, 2024, I electronically filed the foregoing document with the Clerk of the United States District Court for the District of Nebraska using the CM/ECF system, which sent notification of such filing to the following:

Josh Sanford
josh@sanfordlawfirm.com

/s/ Tara A. Stingley